

ROB BONTA, State Bar No. 202668
Attorney General of California
ANYA M. BINSACCA, State Bar No. 189613
Supervising Deputy Attorney General
JAY C. RUSSELL, State Bar No. 122626
JANE E. REILLEY, State Bar No. 314766
Deputy Attorneys General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3617
Fax: (415) 703-5843
E-mail: Jay.Russell@doj.ca.gov
Jane.Reilley@doj.ca.gov
*Attorneys for Sonya Christian, in her official
capacity as Chancellor of the California Community
Colleges*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

DAYMON JOHNSON,

Plaintiff,

v.

STEVE WATKIN, et al.

Defendants.

1:23-cv-00848-ADA-CDB

**DECLARATION OF JAY C. RUSSELL
IN SUPPORT OF DEFENDANT SONYA
CHRISTIAN'S MOTION TO DISMISS**

Date: November 13, 2023
Time: 1:30 p.m.
Dept: 1
Judge: The Honorable Ana I. de Alba
Trial Date: Not Scheduled
Action Filed: June 1, 2023

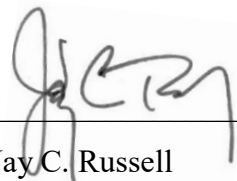
I, Jay C. Russell, declare:

1. I am an attorney admitted to practice before the courts of the State of California. I am employed by the California Attorney General's Office, and am counsel for defendant Sonya Christian, in her official capacity as Chancellor of the California Community Colleges. I am competent to testify to the matters set forth in this declaration and would do so if called upon by the court.

2. This Court's February 23, 2023 Standing Order provides that before filing any motion, "counsel shall engage in a pre-filing meet and confer to thoroughly discuss the substance of the contemplated motion and any potential resolution."

3. On September 28, 2023, counsel for the parties met and conferred via telephone to discuss Defendant Christian's anticipated motion to dismiss. The parties were unable to reach a resolution during that conference.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Signed on October 2, 2023 in San Francisco, California.



Jay C. Russell

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